Crisostomo G. Ibarra (SBN 103480) Gener D. Benitez (SBN 206765) The Law Offices of Crisostomo G. Ibarra 744 Montgomery Street, Suite 120 San Francisco, CA 94111 Telephone: 415-398-5329 3 Facsimile: 415-398-6831 4 5 Attorneys for Defendants KELLY YUDIN and IGOR YUDIN 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 TRACEY THOMPSON TANSY and Case Number: C 05-03494-BZ 11 PATRICK CHAMPLIN TANSY, STIPULATION AND ORDER 12 Plaintiffs, **EXTENDING CLOSE OF** NON-EXPERT DISCOVERY 13 AND LAST DAY TO HEAR 14 DISPOSITIVE MOTIONS NORTH PACIFIC INSURANCE CO., 15 an Oregon corporation; ONEBEACON INSURANCE COMPANY, a 16 Massachusetts corporation; KELLY YUDIN; and IGOR YUDIN, 17 Defendants. 18 19 Plaintiff TRACEY THOMSON TANSY, Defendants KELLY YUDIN, IGOR YUDIN and 20 21 NORTH PACIFIC INSURANCE CO. ("NORTH PACIFIC") (collectively the "Parties"), by and through the undersigned attorneys, hereby stipulate, upon approval by the Court, as follows: 22 WHEREAS, pursuant to the Court's scheduling order, the close of non-expert discovery is 23 24 August 31, 2006, and the last day to hear dispositive motions is November 1, 2006; WHEREAS, counsel for Plaintiff and Defendant NORTH PACIFIC are located in Oregon, 25 26 STIPULATION AND ORDER EXTENDING 27 CLOSE OF DISCOVERY AND LAST DAY TO FILE DISPOSITIVE MOTIONS 28 05-03494-BZ

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1	and Plaintiff is a resident of Argentina;			
2	WHEREAS, due to calendar conflicts and unavailability of the Parties' counsel, as well as			
3	the difficulties of arranging the schedules of the witnesses, the Parties cannot conduct all the			
4	depositions by the close of non-expert discovery, August 31, 2006;			
5	WHEREAS, all the Parties' counsel and witnesses are available on the week of October 23,			
6	2006 to conduct the depositions.			
7	Accordingly, the Parties hereby stipulate to extend the close of non-expert discovery until			
8	October 31, 2006, and to extend the last day to hear dispositive motions to December 15, 2006, to			
9	allow time for the parties to file any dispositive motions after the depositions.			
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13	Dated: August, 2006 Claud Ingram			
14	Attorney for Plaintiff TRACEY THOMSON TANSY			
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17	$\mathcal{C} = \mathcal{R} \cdot I$			
18	Dated: August 30, 2006 Gener D. Benitez			
19	Attorney for Defendants KELLY YUDIN and IGOR YUDIN			
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22	Dated: August, 2006			
23	Stephen E. Lawrence Attorney for Defendant NORTH PACIFIC INSURANCE CO.			
24	NORTH PACIFIC INSURANCE CO.			
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27	STIPULATION AND ORDER EXTENDING CLOSE OF DISCOVERY AND LAST DAY TO FILE DISPOSITIVE MOTIONS			
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1	and Plaintiff is a resident of Argentina;	
2	WHEREAS, due to calendar conflicts and mavailability of	the Parties' counsel, as well as
3	the difficulties of arranging the schedules of the witnesses, the Part	ies cannot conduct all the
4	depositions by the close of non-expert discovery, August 31, 2006;	
5	WHEREAS, all the Parties' counsel and witnesses are avail	able on the week of October 23,
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24	NORT	ey for Defendant H PACIFIC INSURANCE CO.
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27	STIPULATION AND ORDER EXTENDING	
28	CLOSE OF DISCOVERY AND LAST DAY TO FILE DISPOSITIVE MOTIONS 05-03494-BZ 2	i
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and Plaintiff is a resident of Argentina; 2 WHEREAS, due to calendar conflicts and unavailability of the Parties' counsel, as well as 3 the difficulties of arranging the schedules of the witnesses, the Parties cannot conduct all the 4 depositions by the close of non-expert discovery, August 31 2006; WHEREAS, all the Parties' counsel and witnesses are available on the week of October 23, 5 6 2006 to conduct the depositions. Accordingly, the Parties hereby stipulate to extend the close of non-expert discovery until 7 October 31, 2006, and to extend the last day to hear dispositive motions to December 15, 2006, to 8 allow time for the parties to file any dispositive motions after the depositions. 9 10 11 12 13 Dated: August __, 2006 laud Ingram ttorney for Plaintiff 14 RACEY THOMSON TANSY 15 16 17 18 Dated: August ___, 2006 Gener D. Benitez ttorney for Defendants 19 ELLY YUDIN and IGOR YUDIN 20 21 22 Dated: August , 2006 ephen E. Lawrence 23 torney for Defendant DRTH PACIFIC INSURANCE CO. 24 25 26 27 STIPULATION AND ORDER EXTENDING CLOSE OF DISCOVERY AND LAST DA TO FILE DISPOSITIVE MOTIONS 05-03494-BZ 28 2

PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Last day to hear dispositive motions is November 29, 2006. Pretrial and Trial dates remain.

Dated: September 7, 2006



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STIPULATION AND ORDER EXTENDING CLOSE OF DISCOVERY AND LAST DAY TO FILE DISPOSITIVE MOTIONS 05-03494-BZ